

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette,
*On behalf of himself and other similarly
situated individuals,*

Court File No. _____

Plaintiff,

v.

**PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo *in his
individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and official
capacity*; Minnesota State Patrol Colonel
Matthew Langer, *in his individual and
official capacity*; and John Does 1-2, *in
their individual and official capacities*.

Defendants.

Plaintiff Jared Goyette, on behalf of himself and a class of individuals similarly
situated (“Plaintiff Class”), hereby moves for an order certifying the following class:

All members of the news media, as the term is used in Emergency
Executive Order 20-69, who intend to engage in news gathering or reporting
activities in Minnesota related to the protest activities that followed the death
of George Floyd and the law enforcement response to those protests.

For the reasons set forth the accompanying memorandum of law, all of Rule 23’s
prerequisites have been satisfied and the motion for class certification should be granted.

Dated: June 2, 2020

/s/ Kevin C. Riach

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Plaintiff Class*